

1 **Jon M. Moyers, Wyo. State Bar #6-3661**
2 **MOYERS LAW P.C.**
3 **490 N. 31 St., Suite 101**
4 **Billings, Montana 59101**
5 **Telephone: (406) 655-4900**
6 **Facsimile: (406) 655-4905**
7 **jon@jmoyerslaw.com**

8 **Alfred F. Paoli, Jr.**
9 **Bogue Paoli & Thomas LLC**
10 **1401 17th St., Suite 320**
11 **Denver, Colorado 80202**
12 **Telephone: (303) 382-1990**
13 **Facsimile: (303) 382-1982**
14 **fpaoli@bogue-paoli.com**

15 Attorneys for Plaintiffs

16 **UNITED STATES DISTRICT COURT**
17 **FOR THE DISTRICT OF WYOMING**

18 **ESTATE OF RUSSELL MONACO, BY AND)**
19 **THROUGH KATHY MONACO, WRONGFUL)**
20 **DEATH REPRESENTATIVE AND)**
21 **PERSONAL REPRESENTATIVE, AND)**
22 **KATHY MONACO, INDIVIDUALLY AND)**
23 **ON BEHALF OF MINOR CHILDREN,)**

13-CV-151S

Plaintiffs,

vs.

24 **HARLEY G. MORRELL, PA-C, JOHN)**
25 **SCHNEIDER, JR., M.D., NORTHERN)**
26 **ROCKIES NEURO-SPINE, P.C., a Wyoming)**
27 **Corporation, AND JOHN DOES 1 THROUGH)**
28 **10,)**

Defendants.

29 **PLAINTIFFS' SUPPLEMENT TO WRITTEN SUBMISSION CONCERNING THE**
30 **VIABILITY OF PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT AND THE**
31 **EFFECT OF ANY AUTOMATIC STAY IN LIGHT OF DEFENDANT MORRELL'S**
32 **NOTICE OF BANKRUPTCY PROCEEDINGS [74] AND DEFENDANT SCHNEIDER'S**

NOTICE OF BANKRUPTCY PROCEEDINGS [134]

COME NOW Plaintiffs Estate of Russell Monaco, by and through Kathy Monaco, Wrongful Death Representative and Personal Representative, and Kathy Monaco, individually and on behalf of her minor children ("Plaintiffs"), by and through their undersigned counsel of record, Jon M. Moyers, Moyers Law P.C., and Fred Paoli, Bogue Paoli & Thomas LLC, and refers the Court to the attached email of January 7, 2015 from Lisa Hancock, bankruptcy attorney for Harley Morrell.

DATED this 7th day of January, 2015.

MOYERS LAW P.C.

By: /s/ Jon M. Moyers

Jon M. Moyers
Wyo. State Bar #6-3661

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of January, 2015, I electronically filed the foregoing with the Clerk of the Court using CM/ECF System which will send notification of such filing to the following:

Jon M. Moyers jon@jmoyerslaw.com, sherri@jmoyerslaw.com

Alfred F. Paoli fpaoli@bogue-paoli.com, karola@bogue-paoli.com, sbolin@bogue-paoli.com

Stephenson D. Emery semery@wpdn.net, akeller@wpdn.net, mglendenning@wpdn.net, srocha@wpdn.net

I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants:
No manual recipients.

MOYERS LAW P.C.

By: /s/ Jon M. Moyers

Jon M. Moyers
Wyo. State Bar #6-3661

Jon Moyers

From: Lisa Hancock <lhanc@att.net>
Sent: Wednesday, January 7, 2015 10:42 AM
To: jon@jmoyerslaw.com
Subject: Fwd: Morrell
Attachments: SKMBT_28315010712430.pdf; Untitled attachment 00867.htm

Jon,

The Trustee and I are in court now, but have agreed to the lifting of the stay for the purposes of you and the Monaco plaintiffs proceeding in the Wyming District Court suit that will benefit Harley Morrell (and his bankruptcy estate), but not for the purpose collecting or taking other actions detrimental to Mr. Morrell or his estate. I have prepared the attached agreement and affixed my signature electronically. The Trustee has same to review as she can while Court is in session.

Lisa M. Hancock

Begin forwarded message:

From: "Lisa Hancock" <lhanc@charter.net>
Date: January 7, 2015 at 11:35:27 AM CST
To: "Lisa Hancock" <lhanc@att.net>
Subject: Morrell

Modifided Agreement attached.

Kim